

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**NELSON GOMES, MICHAEL
LUCKHOO-BOUCHE, SHANE
SCHMIDT, DOUGLAS ROE, KELLY
WARAWA, FFS CAPITAL LIMITED,
PAIFANG TRADING LIMITED,
ARTEFACTOR LIMITED, ATLANTIAN
MANAGEMENT CORPORATION,
MEADOW ASIA LIMITED, and THYME
INTERNATIONAL LIMITED,**

Defendants.

Civil Action No. 20-CV-11092-FDS

**JOINT MOTION FOR ENTRY OF PROPOSED FINAL JUDGMENT AGAINST
DEFENDANT NELSON GOMES**

Plaintiff Securities and Exchange Commission (the “Commission”) and defendant Nelson Gomes (“Gomes”) move that this Court enter the attached proposed Final Judgment as to Defendant Gomes (“Judgment”). The Commission and Gomes have agreed to all terms in the Judgment. In support of this motion, the parties have also filed a Consent signed by Gomes, memorializing his agreement to the terms of the Judgment.

The parties respectfully request that the Court enter the attached proposed Judgment as to Defendant Gomes.

Dated: September 7, 2021

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION,
By its counsel,

/s/ Kathleen Shields
Kathleen Shields
Eric Forni
33 Arch Street, 24th Floor
Boston, MA 02110
Telephone: (617) 573-8904 (Shields direct)
Fax: (617) 573-4590
Email: shieldska@sec.gov; fornie@sec.gov

NELSON GOMES,
By his counsel,

/s/ Adam Ford
Adam Ford
Suzanne Pope
FORD O'BRIEN LLP
575 Fifth Ave., 17th floor
New York, NY 10017
Phone: (212) 858-0040
Email: aford@fordobrien.com

CERTIFICATE OF SERVICE

I hereby certify that, on September 7, 2021, a true and correct copy of the foregoing document was filed through the Court's CM/ECF system, and accordingly, the document will be sent electronically to all participants registered to receive electronic notices in this case.

/s/ Kathleen B. Shields
Kathleen B. Shields